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VIA ECF

Honorable Douglas E. Arpert
United States District Court
District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street

Trenton, New Jersey 08608

AT 8:30______ WILLIAM T. WALSH CLERK

Re:

Vasudev, et al. v. MMG Group of USA, LLC, et al., 3:15-cv-7554

Dear Judge Arpert:

I represent the plaintiffs in the above-referenced matter and write with the consent of defendants' counsel to jointly request an extension for the parties to file a proposed discovery schedule.

As the Court is aware, the parties are working diligently to resolve an issue relating to the structure of a proposed settlement reached with the assistance of Judge Pisano during mediation. The parties have reached out to Judge Pisano for further assistance and hope to come to an agreement without the need for further judicial intervention.

Moreover, Mr. Gesualdo is having unexpected knee surgery today, which prevents us from addressing this matter for a few more days.

Accordingly, we jointly ask the Court to provide an additional extension until June 30th for the parties to file a proposed discovery schedule. Within that time, we hope to work with Judge Pisano to obviate the need for further litigation and resolve this dispute.

We appreciate the Court's consideration of these requests and its continued attention to this matter.

Respectfully yours,

Glen A. Sproviero

cc:

Michael Gesualdo (via ECF)

So Ordered System usus

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